



DEC 10 2012

The Honorable John Kitzhaber
Governor of Oregon
State Capitol, Room 160
900 Court St. N.
Salem, Oregon 97301

Dear Governor Kitzhaber:

This letter provides approval of Oregon's State Integrated Workforce Plan for Title I of the Workforce Investment Act (WIA), the Wagner-Peyser Act (W-P), including W-P Agricultural Outreach Plan, and plans for coordination with Trade Adjustment Assistance (TAA). The Employment and Training Administration (ETA) received the State Plan on September 17, 2012. This letter also responds to Oregon's WIA waiver requests.

Training and Employment Guidance Letter (TEGL) No. 21-11, issued on March 27, 2012, and TEGL No. 21-11, Change 1 issued on August 8, 2012 provide guidance for states to submit their State Workforce Plans and waivers for Program Year (PY) 2012 and beyond. We appreciate the State's responsiveness to this guidance.

Plan Review and Approval

ETA has reviewed the Oregon State Integrated Workforce Plan in accordance with Title I of WIA, the Wagner-Peyser Act, the Trade Act (as amended), the corresponding regulations, the State Integrated Workforce Plan Requirements for Workforce Investment Act Title I/Wagner-Peyser Act and Department of Labor Workforce Programs (<http://www.doleta.gov/usworkforce/wia-planning/docs/integrated-planning-guidance.pdf>), and TEGL No. 21-11 and the corresponding Change 1. Pursuant to 20 CFR 661.230(e), this letter constitutes a written determination under WIA Section 112 (29 USC 2822) that ETA is approving the WIA Title I, W-P and TAA portions of Oregon's State Plan for the period July 1, 2012 through June 30, 2017, PY 2012-PY 2016. The annual W-P Agricultural Outreach Plan is approved for the period July 1, 2012 through June 30, 2013.

The State is eligible to receive WIA formula allotments for Adult, Dislocated Worker, and Youth programs, and W-P program allotments, effective July 1, 2012 through June 30, 2017.

Performance Levels

Each year, the Regional Administrator negotiates the Program Year's WIA and W-P performance goals with each state. As required by TEGL Nos. 21-11 and 38-11 dated June 18, 2012, negotiations must be completed by December 31, 2012 for PY 2012. Once the final goals are established, the Regional Administrator's letter advising the State of the PY 2012 WIA and W-P final performance goals constitutes a modification to the State Plan. ETA will incorporate Oregon's final performance goals for PY 2012 into the Regional and National Office copies of the State Integrated Workforce Plan. Please include these final PY 2012 goals in the State's official copy of the State Plan.

Waivers

As part of Oregon's State Integrated Workforce Plan, the State submitted waiver requests for waivers of statutory and regulatory requirements under WIA (copy enclosed). The State's requests for waivers are written in the format identified in WIA Section 189(i)(4)(B) and 20 CFR 661.420(c). The disposition of the State's waiver requests is outlined below. This action is taken under the Secretary's authority at WIA Section 189(i) to waive certain requirements of WIA Title I, Subtitles B and E, and Sections 8-10 of the Wagner-Peyser Act.

Waiver to permit the State to replace the performance measures at WIA Section 136(b) with the common measures.

The State requested a waiver that allows the State to replace the 17 performance measures under WIA Section 136(b) with the common measures. The State is granted this waiver through June 30, 2017.

This waiver permits the State to negotiate and report WIA outcomes against the common performance measures only, rather than the performance measures described at WIA Section 136(b). The State will no longer negotiate and report to ETA on the following WIA measures: WIA adult and dislocated worker credential rates; participant and employer customer satisfaction; older youth measures; and younger youth measures. The State will use the three adult common performance measures to negotiate goals and report outcomes for the WIA Adult and WIA Dislocated Worker programs. The State will use the three youth common performance measures to negotiate goals and report outcomes for the WIA Youth program. Workforce Investment Act Standardized Record Data system (WIASRD) item 619, Type of Recognized Credential, should be completed for each individual as appropriate, regardless of this waiver to report on common performance measure outcomes only.

Waiver of the provision at 20 CFR 663.530 that prescribes a time limit on the period of initial eligibility for training providers.

The State requested a waiver of the time limit on the period of initial eligibility of training providers provided at 20 CFR 663.530. The State is granted this waiver through June 30, 2017. Under the waiver, the State is allowed to postpone the determination of subsequent eligibility of training providers. The waiver also allows the State to provide an opportunity for training providers to re-enroll and be considered enrolled as initially eligible providers.

Waiver of WIA Section 134(a) to permit local areas to use a portion of local funds for incumbent worker training.

The State requested a waiver to permit local areas to conduct allowable statewide activities as defined under WIA Section 134(a)(3) with local WIA formula funding, specifically incumbent worker training. The State is granted this waiver through June 30, 2017. Under this waiver, the State is permitted to allow local areas to use up to 10 percent of local Dislocated Worker funds and up to 10 percent of local Adult funds for incumbent worker training only as part of a layoff aversion strategy. Use of Adult funds must be restricted to serving lower income adults under this waiver. ETA believes limiting incumbent worker training to the specified level and requiring it to be a part of layoff aversion is the best use of funds in the current economic climate where serving unemployed workers is a paramount responsibility of the workforce system. All training delivered under this waiver is restricted to skill attainment activities. Local areas must continue to conduct the required local employment and training activities at WIA Section 134(d), and the State is required to report performance outcomes for any individual served under this waiver in the Workforce Investment Act Standardized Record Data system (WIASRD), field 309. TEGL No. 26-09, Section 7A, "Workforce Investment Act (WIA) Waiver Policy and Waiver Decisions for PY 2009 and 2010" and TEGL No. 30-09, "Layoff Aversion Definition and the Appropriate Use of Incumbent Worker Training for Layoff Aversion Using a Waiver" provide policy guidance related to implementation of this waiver.

Waiver of WIA Section 134(a)(1)(A) to permit a portion of the funds reserved for rapid response activities to be used for incumbent worker training.

The State requested a waiver to permit use of rapid response funds to conduct allowable statewide activities as defined under WIA Section 134(a)(3), specifically incumbent worker training. The State is granted this waiver through June 30, 2017. Under this waiver, the State is permitted to use up to 20 percent of rapid response funds for incumbent worker training only as part of a layoff aversion strategy. ETA believes limiting incumbent worker training to layoff aversion is the best use of funds in the current economic climate where serving unemployed workers is a paramount responsibility of the workforce system. All training delivered under this waiver is

restricted to skill attainment activities. The State is required to report performance outcomes for any incumbent workers served under this waiver in the Workforce Investment Act Standardized Record Data system (WIASRD), field 309. TEGL No. 26-09, Section 7A, "Workforce Investment Act (WIA) Waiver Policy and Waiver Decisions for PY 2009 and 2010" and TEGL No. 30-09, "Layoff Aversion Definition and the Appropriate Use of Incumbent Worker Training for Layoff Aversion Using a Waiver" provide policy guidance related to implementation of this waiver.

Waiver of WIA Section 129(b)(2)(C) and 20 CFR 665.200(h) to exempt the state from the requirement to provide additional assistance to local areas that have a high concentration of eligible youth.

The State requested a waiver of the requirement to provide additional assistance to local areas that have a high concentration of eligible youth. The State is granted this waiver through June 30, 2013.

Waiver of WIA Section 134(a)(2)(B)(iii) and 20 CFR 665.200(e) to exempt a state from the requirement to provide local workforce investment area incentive grants.

The State requested a waiver of the requirement to provide local workforce investment areas incentive grants to reward regional cooperation, local coordination of activities, and exemplary performance. The State is granted this waiver through June 30, 2013.

Waiver of the prohibition at 20 CFR 664.510 on the use of Individual Training Accounts for older and out-of-school youth.

The State has withdrawn this waiver request.

Waiver of WIA Section 134(a)(2)(B)(ii) and 20 CFR 665.200(d)) to exempt the state from the requirement to conduct evaluations.

The State has withdrawn this waiver request.

The approved waivers are incorporated by reference into the State's WIA Grant Agreement, as provided for under paragraph 3 of the executed Agreement, and are incorporated into the State Integrated Workforce Plan. A copy of this letter should be filed with the State's WIA Grant Agreement and with the approved State Plan. In addition, as described in TEGL No. 29-11, the State should address the impact these waivers have had on the State's performance in the WIA annual performance report, due on October 1 of each year.

We look forward to working together as you implement your State Integrated Workforce Plan for PY 2012 and beyond. Thank you for co-branding as a proud partner of the American Job Center network; we are available to provide technical assistance as needed.

If you have any questions related to the issues discussed above, please contact Marian Esver, the Federal Project Officer for Oregon, at 415-625-7948 or Esver.Marian@dol.gov.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jane Oates".

Jane Oates
Assistant Secretary

Enclosures

cc: Virginia Hamilton, Regional Administrator, ETA San Francisco Regional Office
Marian Esver, Federal Project Officer for Oregon

From: Greg White [greg.white@state.or.us]
Posted At: Friday, September 14, 2012 6:47 PM
Conversation: Submission of Oregon's WIA/Wagner-Peyser/TAA Integrated Plan
Posted To: WIA.PLAN

Subject: Submission of Oregon's WIA/Wagner-Peyser/TAA Integrated Plan

Attn: Heather Fleck

Oregon has submitted its five-year Integrated State Plan by posting it to a website. The URL is:

<http://www.worksourceoregon.org/state-workforce-board/oregon-5-year-state-plan>

My contact information is below. Please contact me if there are any problems accessing the website or for any other matter related to the State Plan.

Greg White

Greg White
Executive Staff
Oregon Workforce Investment Board
(503) 947-2451
Greg.white@state.or.us

Quality Jobs – Skilled Workers: Contributing to a strong state economy and local prosperity

REQUEST APPROVAL OF WAIVER
Workforce Investment Act Waiver Request

Waive Time Limit on Initial Eligibility for Approved Providers

Date: September 14, 2012

State: Oregon

Agency: Oregon Department of Community Colleges and Workforce Development

1. Statutory and/or regulatory requirements to be waived

- WIA Section 122 (c)(5) and 20 CFR 663.530 provision that prescribes a time limit on the period of initial eligibility for training providers.

2. Actions undertaken to remove state or local barriers

There are no state or local barriers. This represents an extension of a current waiver granted through December 31, 2012.

3. Goals and expected programmatic outcomes of waiver

Oregon is requesting a waiver to postpone the determination of subsequent eligibility of training providers, and is requesting the ability to provide an opportunity for training providers to re-enroll and be considered enrolled as initially eligible providers.

Oregon's Commitment to Maintaining a Robust and Diverse Eligible Training Provider List

Oregon is committed to maintaining a quality verified list of training providers, from which customers can make informed choices about their training. Oregon has a web-based consumer report card with performance and cost information from training providers, which is accessible for WorkSource Oregon one stop customers.

Because of Oregon's commitment to the concept, we have a very robust and diverse Eligible Training Provider List (ETPL). There are currently 982 training programs on our list. This is an impressive number for a small state with large rural areas where there are few training providers.

Oregon has maintained the programs and providers on the list largely because Oregon as a state has assumed the majority of the data collection burden for the training providers. The state made the commitment to collect the required performance data at the state level through existing data and reporting systems. As a result, the training providers must collect social security numbers and training completion information for the students in each program, but the state in turn uses existing data systems and reports to compile the data necessary to compute the performance of the providers. For example, to verify the data for the employment-related measures, Oregon has chosen to use the Unemployment Insurance (UI) data record, rather than to require providers to

gather the data themselves. This is in contrast to many other states where providers have withdrawn their programs from the ETPL because of the burden of data gathering and reporting.

Oregon took this approach to maintain the flexibility and customer choice necessary to provide quality training opportunities for participants. Taking this approach has placed an immense data development and coordination task onto the state itself, rather than requiring each individual provider to compile the data.

Need for Waiver

Although Oregon is committed to maintaining an extensive list and a comprehensive consumer report card, Oregon needs to be able to postpone the determination of subsequent eligibility of training providers. Oregon will provide an opportunity for training providers to re-enroll and be considered enrolled as initially eligible providers. Specific problems are related to the implementation of an effective subsequent eligibility process because of a lack of consistent accurate data:

- There are five categories of training programs on Oregon's ETPL. These are community colleges, private career schools, independent colleges and degree-granting institutions, the university system, and apprenticeship programs. Each of these types of institutions has its own separate data reporting system. Most report only annually, and not on the same schedules. Many are self-reported, non-verified reports.
- The Attorney General of Oregon has ruled that specific language be used for individual voluntary release of information to allow the use of social security numbers (SSN) for WIA data purposes. Not all training providers in the state are currently using the approved language.
- There is a lag time in UI data reporting that results in not being able to match any of the student records for training completers. Employers submit UI wage data for a given quarter during the subsequent two full quarters after that quarter's end, and to obtain a reliable employment rate or average wage for a given quarter, it is necessary to wait until after the close of the second quarter following the quarter of interest. Several weeks of processing time are the minimum necessary to ensure accurate reporting, which requires additional time beyond that needed to determine subsequent eligibility.
- Oregon continues to struggle with the applicability of the "all students" data we are able to access for the performance measures for subsequent eligibility. Requiring "all students' data reporting at this time will result in providers and programs asking to be removed from the list.

In short, the above circumstances mean that Oregon does not have good data for all seven required performance measures, from all providers, within the time frame needed to be able to determine subsequent eligibility prior to the period when initial eligibility expires. This could likely leave Oregon out of compliance with the Act.

4. Individuals impacted by the waiver

All stakeholders and customers involved in WIA Training Services will be positively impacted by the waiver. This includes customers eligible for and ITA, training providers, and Local Workforce Investment Boards.

5. Process for monitoring progress in implementation

The Commissioner of the Oregon Department of Community Colleges and Workforce Development and staff will monitor progress on the goals and timeline. In addition, the Oregon Workforce Investment Board (OWIB, the State WIB) receives periodic reports on progress made regarding the ETPL.

6. Notice to Affected Local Boards and Public Comment

This waiver request was included in the State of Oregon ~~Two-Five~~ Five Year Plan for Title I of the Workforce Investment Act and the Wagner-Peyser Act for July 1, 2012 – June 30, 2014~~7~~, as submitted to U.S. Department of Labor (DOL) by posting the plan on www.worksourceoregon.org. The Plan, including this waiver request, underwent a 15-day public notice and review process completed September, 2012. The public notice document was mailed and/or e-mailed to over 2000 individuals and organizations, including local workforce board staff and chairs, labor and business organizations, state agencies, the OWIB, other appropriate boards and commissions, local elected officials, and other interested stakeholders. No public comments were received.

REQUEST APPROVAL OF WAIVER Workforce Investment Act Waiver Request

Permit Local Areas to Use a Portion of Funds for Incumbent Worker Training

Date: September 14, 2012

State: Oregon

Agency: Oregon Department of Community Colleges and Workforce Development

1. Statutory and/or regulatory requirements to be waived

- WIA Section 134(a) limiting the provision of incumbent worker training to the 15% Statewide Activities funds.

2. Actions undertaken to remove state or local barriers

There are no state or local barriers. This represents an extension of a current waiver granted through December 31, 2012.

3. Goals and expected programmatic outcomes of waiver

This waiver is requested to permit local areas to conduct allowable statewide activities as defined under WIA Section 134(a)(3) with local WIA formula funding, specifically incumbent worker training.

Under this waiver, Oregon is requesting to allow local areas to use up to 10 percent of local Dislocated Worker funds and up to 10 percent of local Adult funds for incumbent worker training only as part of a layoff aversion strategy. Use of Adult funds will be restricted to serving lower income adults under this waiver. Oregon believes limiting incumbent worker training to layoff aversion is the best use of funds in the current economic climate where serving unemployed workers is a paramount responsibility of the workforce system.

Oregon believes limiting incumbent worker training to the specified level and requiring it to be part of layoff aversion is the best use of funds in the current economic climate where serving unemployed workers is a paramount responsibility of the workforce system. All training delivered under this waiver will be restricted to skill attainment activities supporting layoff aversion. Local areas will continue to conduct the required local employment and training activities at WIA Section 134(d), and Oregon will report performance outcomes for any individual served under this waiver in the Workforce Investment Act Standardized Record Data System (WIASRD), field 309. Oregon will follow policy guidance related to implementation of this waiver founding in TEGL No. 26-09, Section 7A, "Workforce Investment Act (WIA)

Waiver Policy and Waiver Decisions for PY 2009 and 2010” and TEGL No. 30-09, “Layoff Aversion Definition and the Appropriate Use of Incumbent Worker Training for Layoff Aversion using a Waiver.”

The criteria Oregon uses in identifying appropriate use of Incumbent Worker Training are detailed in CCWD Policy 589-20.10.

Layoff Aversion Project requests may be made at any time to CCWD and address the following details:

- a. the employer and project partners, a target population description including job titles and demographics, number of workers to be served, how the project will avert the layoff, and timelines for implementation,
- b. evidence that the project will enable current workers to maintain their employment throughout the project, earn credential or certification level increases, wage increases or promotion opportunities, and retain their employment with the employer for an agreed period of time,
- c. evidence of economic impact in the community if this project should not be funded and layoffs occur, and demonstration of how this project strengthens the employer and will stabilize it such that this type of project will not need to be repeated in the near future, and
- d. a budget, budget narrative, and a line item budget indicating cash/non-cash match by the employer and/or project partners.

This waiver results in local boards being able to use all or a portion of formula funding for incumbent worker training, allowing greater flexibility in meeting the needs of targeted sectors and incumbent workers. It enhances the ability of local Workforce Investment Boards to improve job retention, avoid layoffs and increase the competitiveness of sectors targeted in local areas.

4. Individuals impacted by the waiver

This waiver will impact participating employers and incumbent workers. The flexibility provided encourages Local Workforce Boards to increase their services to business and workers, and be better able to engage in layoff aversion strategies.

5. Process for monitoring progress in implementation

The State and Local Areas will monitor the process of the waiver through quarterly programmatic and fiscal reviews and reports. Data for the following will be collected and reported:

- Number of program participants;
- Number of program participants who completed training;
- Type of training provided;
- Length of training provided
- Number of program participants who received a credential or certificate;
- Program participants wage gain at completion of training and six months after completion; and

- Number of participants whose job classification changed or skills were upgraded.

6. Notice to Affected Local Boards and Public Comment

This waiver request was included in the State of Oregon ~~Two~~-Five Year Plan for Title I of the Workforce Investment Act and the Wagner-Peyser Act for July 1, 2012 – June 30, 20147, as submitted to U.S. Department of Labor (DOL) by posting the plan on www.worksourceoregon.org. The Plan, including this waiver request, underwent a 15-day public notice and review process completed September, 2012. The public notice document was mailed and/or e-mailed to over 2000 individuals and organizations, including local workforce board staff and chairs, labor and business organizations, state agencies, the OWIB, other appropriate boards and commissions, local elected officials, and other interested stakeholders. No public comments were received.

REQUEST APPROVAL OF WAIVER

Workforce Investment Act Waiver Request

Permit a Portion of Rapid Response Funding to be Used for Incumbent Worker Training

Date: September 14, 2012

State: Oregon

Agency: Oregon Department of Community Colleges and Workforce Development

1. Statutory and/or regulatory requirements to be waived

- CFR 665.320(d)(2), for funds reserved for allowable estate activities under WIA Section 133 (a)(2), up to 20 percent of the state set-aside Rapid Response funds to be used for the purposes of the funds reserved under WIA Section 128(a)(2).

2. Actions undertaken to remove state or local barriers

There are no state or local barriers. The state follows the federal rules. In the past, Oregon did what it could in budgeting the Employer Workforce Training Funds to minimize Rapid Response in the fund and maximize the Governor's Reserve in the fund. At the present time, there are no Governor's Reserve 10% funds to budget for the fund, so the program is currently not offered. However, recent Congressional discussions make it seem probable that the 10% funds will be at least partially restored. Accordingly, Oregon is requesting the waiver to have it ready for when the 10% funding is available. This request represents an extension of a current waiver granted through December 31, 2012.

3. Goals and expected programmatic outcomes of waiver

Oregon is requesting a waiver to use up to 20 percent of rapid response funds for incumbent worker training only as part of a layoff aversion strategy. Oregon believes limiting incumbent worker training to layoff aversion is the best use of funds in the current economic climate where serving unemployed workers is a paramount responsibility of the workforce system.

All training delivered under this waiver will be restricted to skill attainment activities. Oregon will report performance outcomes for any incumbent workers served under this waiver in the Workforce Investment Act Standardized Record Data system (WIASRD), field 209. Oregon will follow policy guidance related to implementation of this waiver, as found in TEGL No. 26-09, Section 7, "Workforce Investment Act (WIA) Waiver Policy and Waiver Decisions for PY 2009 and 2010" and TEGL No. 30-09, "Layoff Aversion Definition and the Appropriate Use of Incumbent Worker Training for Layoff Aversion Using a Waiver."

Oregon's Incumbent Worker Training Strategy

Oregon's incumbent worker training program, a Governor's initiative called the Employer Workforce Training Fund, is made up of Governor's reserve (known as 15%) funds and state set-aside Rapid Response (known as 25%) funds.

Originally, Oregon distributed both funding streams to Workforce Response Teams in Oregon's 15 workforce regions to carry out incumbent worker training projects, tied to demand in their regional economies. The state had to instruct the teams' regional fiscal agents to keep the funds and their allowable uses separate.

Before the waiver was received, the local Workforce Response Teams (WRT's) had to maintain the two funds separately in their contracts with businesses. Because the rapid response funds could not be used for direct training, we called them "Capacity-Building Funds." These funds could be used for any of the costs associated with the program except training, such as employer needs assessments, curriculum development, consortium building, etc. The statewide activities funds, because they could be used for training (as well as the other activities), we called "Training Funds." Having the two funding streams was confusing, cumbersome, and difficult to explain to businesses.

This was a cumbersome process that was incomprehensible to business, and it limited the ability of local program operators to direct funds where most needed, and diminished the numbers of incumbent workers who could receive training.

The waiver eliminated the barriers created when using two types of funding with different allowable uses to develop projects with business. These barriers include limitations on the numbers to be trained, the difficulty of tying the rapid response funding to training projects, the administrative difficulties of separately tracking the two funding sources and their allowable uses, and the difficulties of making the complexities of the funding transparent to business.

This waiver was originally requested to simplify the process of using two funds for incumbent worker training. It increased the amount available for the direct training of incumbent workers and simplified the program for participating employers. We asked for a transfer authority but DOL approved, instead, the use of RR funds for the uses of the 10% funds,

Within the current funding framework, the waiver allows local areas to direct the funds to incipient layoffs, and to provide training as a layoff aversion strategy. This creates greater flexibility and resources for local areas to respond to employer needs as they emerge and to prevent layoffs.

The criteria Oregon uses in identifying appropriate use of rapid response funding to be used for incumbent worker training are detailed in Governor's Executive Order #03-16, Employer Workforce Training Fund. This states that:

The Oregon Workforce Investment Board (OWIB) Strategic Plan is the guiding strategy for EWTF activities. The regional WRT funding structure and uses must align with the OWIB Strategic Plan.

WRT Rapid Response funds allocated under this policy must be used for layoff aversion purposes only. Layoff aversion activities are restricted to skill attainment training or retraining of employees of businesses that are at risk of laying off part or all of their workforce.

In order to be eligible for the use of Rapid Response waiver funds for incumbent worker training, employers or individuals must be able to demonstrate that a layoff could be avoided by providing training to upgrade or to impart new skills to the affected employees.

Criteria to be used to determine an employer's or individual's layoff risk may be found in TEGL 30-09. LWIB's shall provide assurances that the employer or individual meets the layoff aversion criteria through certification in the application for funds, in the contract provisions, or through an employer statement that is included in the funding contract.

Employers must also demonstrate a commitment to retain employees or otherwise provide a tangible benefit to employees who receive incumbent worker training and certify that the training is not part of the employer's regular training plan for employees. Individuals must demonstrate that there exists a strong possibility of a job, either with the existing employer or a new employer, if they attain new skills.

Rapid Response waiver funds cannot be used to train workers who have received a layoff notice or who have been laid off their jobs. These workers may be served with the local area's regular WIA Title IB Adult or Dislocated Worker funds. These funds may be used, however, for training employees of businesses that have made a general announcement that a facility will close or the layoff is more than 180 days in the future, and, therefore, the workers are not eligible for training funds under WIA Title IB Dislocated Worker eligibility provisions in WIA Section 101(9)(B)(iii). In this case, the employer must certify that the employees are at risk of layoff and the training provided to the employees will avert their being laid off.

Statewide Activities funds used for incumbent worker training are not subject to the layoff aversion requirements.

Eighty percent or more of WRT funds must be used for training workers. Up to 20% of the region's WRT allocation may be used for training related activities. Within this 20%, only 10% of costs may be used for curriculum development. At the end of the program year, CCWD will test expenditures to ensure compliance with this requirement.

Oregon will continue to carry out all required state level activities; the use of the funds is for allowable activities only. The use of the funds will not diminish the ability of the state or local areas to respond to worker dislocations, nor will it affect local formula allocations for carrying out WIA Title IB adult, youth, and dislocated worker activities.

Fiscal agents for the Employer Workforce Training Fund are required to report quarterly and annually in order for the state to track progress on various outcome measures for the program.

4. Individuals impacted by the waiver

The Employer Workforce Training Fund supports a program to train incumbent (current) workers. For the purposes of this program, “current worker” is defined as “an individual currently employed in an existing non-public business in Oregon.”

5. Process for monitoring progress in implementation

Implementing the waiver itself is an administrative procedure of simply transferring the funds. Fiscal agents for the Employer Workforce Training Fund are required to report quarterly and annually in order for the state to track progress of various outcome measures for the program.

Oregon will report performance outcomes for any incumbent workers served under this waiver in the Workforce Investment Act Standardized Record Data system (WIASRD), field 209. Oregon will follow policy guidance related to implementation of this waiver, as found in TEGL No. 26-09, Section 7!, “Workforce Investment Act (WIA) Waiver Policy and Waiver Decisions for FY 2009 and 2010” and TEGL No. 30-09, “Layoff Aversion Definition and the Appropriate Use of Incumbent Worker Training for Layoff Aversion Using a Waiver.”

6. Notice to Affected Local Boards and Public Comment

This waiver was developed at the request of local boards. The boards were concerned because of the difficulty of developing effective training programs using the two types of funding. State staff developed the concept for the waiver and presented it to local board staff at the regular meeting of the Oregon Workforce Partnership (OWP – the local board association in Oregon) on April 9, 2004. Local board staff enthusiastically supported proceeding with requesting the waiver. The OWP appointed two members to review the original draft waiver request document before it was submitted.

This waiver request was included in the State of Oregon ~~Two-Five~~ Year Plan for Title I of the Workforce Investment Act and the Wagner-Peyser Act for July 1, 2012 – June 30, 2014~~7~~, as submitted to U.S. Department of Labor (DOL) by posting the plan on www.worksourceoregon.org. The Plan, including this waiver request, underwent a 15-day public notice and review process completed September, 2012. The public notice document was mailed and/or e-mailed to over 2000 individuals and organizations, including local workforce board staff and chairs, labor and business organizations, state agencies, the OWIB, other appropriate boards and commissions, local elected officials, and other interested stakeholders. No public comments were received.

REQUEST APPROVAL OF WAIVER **Workforce Investment Act Waiver Request**

Waive Prohibition on the Use of ITAs for Older and Out-of-School Youth

Date: September 14, 2012

State: Oregon

Agency: Oregon Department of Community Colleges and Workforce Development

1. Statutory and/or regulatory requirements to be waived

- ~~20 CFR 664.510 prohibits the use of Individual Training Accounts (ITAs) for older youth and out-of-school youth program participants, unless they are found eligible for and co-enrolled in either the adult or dislocated worker program.~~

2. Actions undertaken to remove state or local barriers

~~There are no state or local barriers. This represents an extension of a current waiver granted through December 31, 2012.~~

3. Goals and expected programmatic outcomes of waiver

~~Oregon seeks to use Individual Training Accounts (ITAs) for older youth and out-of-school youth program participants. Under the waiver, Oregon will continue to make the 13 youth program elements available as described at WIA Section 129(c)(2). Oregon will ensure that funds used for ITAs are tracked and that the ITAs are reflected in the individual service strategies for these youth.~~

~~This waiver will maximize the service delivery capacity of WIA youth programs within the One-Stop Career Center delivery system, by giving local areas the flexibility to meet the needs of individual youth. It will allow youth who are determined not to follow the academic track and are, instead, employment focused, to have the same access as adults and dislocated workers to the advantages of ITAs. The WIA youth system will transform building a more robust pipeline of workers for targeted industries and occupations through a focus on academic preparation, intensive career counseling and exposure and transition support for the success of enrolled youth in post-secondary education and training.~~

~~By providing a waiver to all the use of ITAs for youth, without the need for co-enrollment, those youth whose assessment has determined that an ITA is the best strategy will be treated equally with an adult who has the same or similar needs and training strategies. Being able to charge the ITA cost to the youth program instead of the adult or dislocated worker program reduces the dependence on limited adult funds.~~

~~4. Individuals impacted by the waiver~~

~~The impact of the waiver is on older youth who benefit from ITAs. Indirectly, the waiver also benefits LWIBs who experience reduced staff time spent on eligibility workers who do not have to expend time on collecting eligibility data and going through the duplicative eligibility determination process.~~

~~5. Process for monitoring progress in implementation~~

~~The State and LWIBs will report on the numbers of youth provided with ITAs, track the funds used for ITAs, and assure that the ITAs are reflected in the individual service strategies for these youth. State monitors will also select youth ITA files for review, to ensure that there are appropriate levels of assessment documentation in the files to justify the use of ITAs for any individual older youth.~~

~~6. Notice to Affected Local Boards and Public Comment~~

~~This waiver request was included in the State of Oregon Two Five Year Plan for Title I of the Workforce Investment Act and the Wagner-Peyser Act for July 1, 2012—June 30, 20147, as submitted to U.S. Department of Labor (DOL) by posting the plan on www.worksourceoregon.org. The Plan, including this waiver request, underwent a 15-day public notice and review process completed September, 2012. The public notice document was mailed and/or e-mailed to over 2000 individuals and organizations, including local workforce board staff and chairs, labor and business organizations, state agencies, the OWIB, other appropriate boards and commissions, local elected officials, and other interested stakeholders. No public comments were received.~~

REQUEST APPROVAL OF WAIVER
Workforce Investment Act Waiver Request

Waive Requirement to Conduct Evaluation of Workforce Development Activities

Date: September 14, 2012

State: Oregon

Agency: Oregon Department of Community Colleges and Workforce Development

1. Statutory and/or regulatory requirements to be waived

- ~~WIA Section 134(a)(2)(B)(ii) and 20 CFR 665.200(d) to exempt the state from the requirement to conduct evaluations.~~

2. Actions undertaken to remove state or local barriers

~~There are no state or local barriers.~~

3. Goals and expected programmatic outcomes of waiver

~~Oregon is requesting a waiver from the requirement to conduct evaluations of workforce investment activities for adults, dislocated workers, and youth in order to establish and promote continuous improvements of the statewide workforce investment system.~~

~~The reduction to five percent in the WIA allotment for Governor's Reserve funds restricts the state's ability to effectively fund and carry out all of the required statewide workforce investment activities. The current funding level in the Governor's Reserve is insufficient to cover the cost of evaluations. The state's reduced funds are being used to cover the following required activities:~~

- ~~Required statewide administrative activities~~
- ~~Technical Assistance to Local Areas~~

~~The programmatic outcome of the waiver is to ensure that the state may prioritize the use of Governor's Reserve funds for the required activities that Oregon deems most essential to the basic functions of the workforce investment system.~~

4. Individuals impacted by the waiver

~~A total of \$66,000 is currently budgeted for PY 2012. The waiver will not be implemented until PY 2013. This amount has been reduced over the years, and especially for PY 2012, as funding has been reduced. While the amount of funding is not large, every amount of savings helps in order to maintain robust administrative services with the 5% Administration funds.~~

~~Due to the loss of the 10% funding, Oregon must now use limited rapid Response funds or more likely, administrative funds for these program related activities. While allowable, it puts Oregon's administrative and fiscal integrity in jeopardy.~~

~~If this waiver is granted, evaluation of workforce investment activities for adults, dislocated workers, and youth will not be conducted for PY 13 or subsequent program years, or until the 10% funding is restored by Congress.~~

~~The waiver will provide Oregon with more flexibility in directing Governor's reserve funds to those activities that best preserve basic functions of the statewide workforce investment system, thereby maintaining services for all eligible individuals, including youth.~~

~~5. Process for monitoring progress in implementation~~

~~Oregon will monitor progress and ensure accountability for Federal funds in connection with these waivers by reviewing monthly expenditure, performance and other reports, through regular contact with the ETA Regional Office liaisons, and through its monitoring and performance accountability system.~~

~~6. Notice to Affected Local Boards and Public Comment~~

~~This waiver request was included in the State of Oregon Two Five Year Plan for Title I of the Workforce Investment Act and the Wagner Peyser Act for July 1, 2012 – June 30, 20147, as submitted to U.S. Department of Labor (DOL) by posting the plan on www.worksourceoregon.org. The Plan, including this waiver request, underwent a 15-day public notice and review process completed September, 2012. The public notice document was mailed and/or e-mailed to over 2000 individuals and organizations, including local workforce board staff and chairs, labor and business organizations, state agencies, the OWIB, other appropriate boards and commissions, local elected officials, and other interested stakeholders. No public comments were received.~~

REQUEST APPROVAL OF WAIVER
Workforce Investment Act Waiver Request

Waive Requirement to Fund Performance Incentives to Local Areas

Date: September 14, 2012

State: Oregon

Agency: Oregon Department of Community Colleges and Workforce Development

1. Statutory and/or regulatory requirements to be waived

- WIA Section 134(a)(2)(B)(iii) and 20 CFR 665.200(e) to exempt Oregon from the requirement to provide local workforce investment area incentive grants.

2. Actions undertaken to remove state or local barriers

There are no state or local barriers. It might have been expected that Local Workforce Investment Boards could object to this waiver because they will lose funding. However, Oregon's seven LWIBs have agreed to this waiver, understanding that the funds just aren't available. They have asked for and will be included in the implementation of the waiver for PY 2013.

3. Goals and expected programmatic outcomes of waiver

The waiver is being requested to exempt Oregon from the requirement to provide local workforce investment areas incentive grants to reward regional cooperation, local coordination of activities, and exemplary performance.

The reduction to five percent in the WIA allotment for Governor's Reserve funds restricts the state's ability to effectively fund and carry out all of the required statewide workforce investment activities. The current funding level in the Governor's Reserve is insufficient to cover the cost of incentives. The state's reduced funds are being used to cover the following required activities:

- Required statewide administrative activities
- Technical assistance to Local Areas

The programmatic outcome of the waiver is to ensure that the state may prioritize the use of Governor's Reserve funds for the required activities that Oregon deems most essential to the basic functions of the workforce investment system.

CCWD's most recent 9130 submission (June 30, 2012) shows CCWD has significant funds available in the Statewide Activities (SWA) line item for PY 10, PY 11 and PY 12. However, this doesn't reflect the entire SWA picture. The September 30, 2012 report will show even

smaller numbers of available SWA. The total SWA number reported to DOL does not differentiate between the state and local amounts. The non-local portion of the funds is significantly smaller, reducing the amount of funds available for state use. For example in Program Year 2011, \$450,451.01 was reported in total (Youth, DW, Adult PY & FY) for available SWA funds, however, \$143,551.18 is unobligated at the local level, reducing the total unobligated at the state by 32%.

It should also be noted that payroll, rent, additional assistance, admin dollars and other large budget items cannot be included in these submissions as they are not allowed to be accrued expenditures beyond the current month. For perspective, payroll for CCWD is just under \$3 million annually.

Currently, we have budgeted only \$70,000 for Incentive Awards. While this meets the letter of the law, this is not a meaningful incentive for performance of our LWIBs. We are seeking the waiver because we cannot provide any meaningful incentive within the constraints of our current funding and with the reduction of 10% funds. These funds would have more impact if expended on providing other required statewide activities.

4. Individuals impacted by the waiver

A total of \$70,000 is currently budgeted for PY 2012. The waiver will not be implemented until PY 2013. This amount has been reduced over the years, and especially for PY 2012, as funding has been reduced. While the amount of funding is not large, every amount of savings helps in order to maintain robust administrative services with the 5% Administration funds.

Due to the loss of the 10% funding, Oregon must now use limited rapid Response funds or more likely, administrative funds for these program-related activities. While allowable, it puts Oregon's administrative and fiscal integrity in jeopardy.

If this waiver is granted, the seven local boards will not receive an incentive grant award for PY 13 or subsequent program years, or until the 10% funding is restored by Congress.

The waiver will provide Oregon with more flexibility in directing Governor's reserve funds to those activities that best preserve basic functions of the statewide workforce investment system, thereby maintaining services for all eligible individuals, including youth.

5. Process for monitoring progress in implementation

Oregon will monitor progress and ensure accountability for Federal funds in connection with these waivers by reviewing monthly expenditure, performance and other reports, through regular contact with the ETA Regional Office liaisons, and through its monitoring and performance accountability system.

6. Notice to Affected Local Boards and Public Comment

This waiver request was included in the State of Oregon ~~Two-Five~~ Five Year Plan for Title I of the Workforce Investment Act and the Wagner-Peyser Act for July 1, 2012 – June 30, 2014~~7~~7, as submitted to U.S. Department of Labor (DOL) by posting the plan on www.worksourceoregon.org. The Plan, including this waiver request, underwent a 15-day public notice and review process completed September, 2012. The public notice document was mailed and/or e-mailed to over 2000 individuals and organizations, including local workforce board staff and chairs, labor and business organizations, state agencies, the OWIB, other appropriate boards and commissions, local elected officials, and other interested stakeholders. No public comments were received.

REQUEST APPROVAL OF WAIVER Workforce Investment Act Waiver Request

Waiver Requirement to Fund Local Areas with High Concentrations of Youth

Date: September 14, 2012

State: Oregon

Agency: Oregon Department of Community Colleges and Workforce Development

1. Statutory and/or regulatory requirements to be waived

- WIA Section 129(b)(2)(C) requiring the state to provide additional assistance to local areas that have high concentrations of eligible youth.

2. Actions undertaken to remove state or local barriers

There are no state barriers to implementation of the waiver. It might have been expected that Local Workforce Investment Boards could object to this waiver because they will lose funding. However, Oregon's seven LWIBs have agreed to this waiver, understanding that the funds just aren't available. They have asked for and will be included in the implementation of the waiver for PY 2013.

3. Goals and expected programmatic outcomes of waiver

The waiver is being requested to exempt Oregon from the requirement to provide additional assistance to local areas that have high concentrations of WIA eligible youth.

The reduction to five percent in the WIA allotment for Governor's Reserve funds restricts the state's ability to effectively fund and carry out all of the required statewide workforce investment activities. The current funding level in the Governor's Reserve is insufficient to cover the cost of providing additional assistance to local areas that have high concentrations of eligible youth. The state's reduced funds are being used to cover the following required activities:

- Required statewide administrative activities
- Technical assistance to Local Areas

The programmatic outcome of the waiver is to ensure that the state may prioritize the use of Governor's Reserve funds for the required activities that Oregon deems most essential to the basic functions of the workforce investment system.

CCWD's most recent 9130 submission (June 30, 2012) shows CCWD has significant funds available in the Statewide Activities (SWA) line item for PY 10, PY 11 and PY 12. However, this doesn't reflect the entire SWA picture. The September 30, 2012 report will show even smaller numbers of available SWA. The total SWA number reported to DOL does not

differentiate between the state and local amounts. The non-local portion of the funds is significantly smaller, reducing the amount of funds available for state use. For example in Program Year 2011, \$450,451.01 was reported in total (Youth, DW, Adult PY & FY) for available SWA funds, however, \$143,551.18 is unobligated at the local level, reducing the total unobligated at the state by 32%.

It should also be noted that payroll, rent, additional assistance, admin dollars and other large budget items cannot be included in these submissions as they are not allowed to be accrued expenditures beyond the current month. For perspective, payroll for CCWD is just under \$3 million annually.

Currently, we have budgeted only \$100,000 for High Concentration of Eligible Youth (HCEY). While this meets the letter of the law, when divided among the local areas this doesn't provide LWIBs with substantive funding for HCEY. We are seeking the waiver because we cannot provide any meaningful funding within the constraints of our current funding and with the reduction of 10% funds. These funds would have more impact if expended on providing other required statewide activities.

4. Individuals impacted by the waiver

A total of \$100,000 is currently budgeted for PY 2012. The waiver will not be implemented until PY 2013. This amount has been reduced over the years, and especially for PY 2012, as funding has been reduced. While the amount of funding is not large, every amount of savings helps in order to maintain robust administrative services with the 5% Administration funds.

Due to the loss of the 10% funding, Oregon must now use ~~limited Rapid Response funds or more likely,~~ administrative funds for these program-related activities. While allowable, it puts Oregon's administrative and fiscal integrity in jeopardy.

If this waiver is granted, the seven local boards will not receive a high concentration youth grant award for PY 13 or subsequent program years, or until the 10% funding is restored by Congress.

The waiver will provide Oregon with more flexibility in directing Governor's reserve funds to those activities that best preserve basic functions of the statewide workforce investment system, thereby maintaining services for all eligible individuals, including youth.

5. Process for monitoring progress in implementation

Oregon will monitor progress and ensure accountability for Federal funds in connection with these waivers by reviewing monthly expenditure, performance and other reports, through regular contact with the ETA Regional Office liaisons, and through its monitoring and performance accountability system.

6. Notice to Affected Local Boards and Public Comment

This waiver request was reviewed with all Local Workforce Investment Boards.

This waiver request was included in the State of Oregon ~~Two-Five~~ Five Year Plan for Title I of the Workforce Investment Act and the Wagner-Peyser Act for July 1, 2012 – June 30, 2014~~7~~7, as submitted to U.S. Department of Labor (DOL) by posting the plan on www.worksourceoregon.org. The Plan, including this waiver request, underwent a 15-day public notice and review process completed September, 2012. The public notice document was mailed and/or e-mailed to over 2000 individuals and organizations, including local workforce board staff and chairs, labor and business organizations, state agencies, the OWIB, other appropriate boards and commissions, local elected officials, and other interested stakeholders. No public comments were received.

Trade Adjustment Assistance (TAA):

How TAA will coordinate with WIA/W-P to provide seamless services to participants

- ***Provides early intervention (e.g. rapid response) to worker groups on whose behalf a TAA petition has been filed. (WIA Sections 112(b)(17)(A)(ii), 134(a)(2)(A), 20 CFR 665.300-.340.)***

State-level Trade Act staff, state-level Rapid Response staff, and local WIA I-B staff coordinate service delivery for every Trade Act petition filed in Oregon. As part of their ongoing partnership, Trade Act and Rapid Response staff meet regularly to maintain communication channels and ensure the highest level of strategic, coordinated service delivery. This includes weekly and monthly meetings.

Rapid Response staff is normally notified of a mass layoff first, and through their delivery of Rapid Response services, they often assist with a Trade Act petition. Early involvement by Rapid Response and Trade Act staff helps allay concerns about the Trade Act program and impact to the employer, educates the employer on how to best help the affected workers regarding TAA/TRA eligibility determinations, and establishes early collaboration with the key parties. These efforts streamline the eligibility process, and quickly move the workers into service delivery. It is important to note that the Trade Act and Rapid Response partnership and coordination is formally summarized in an MOU.

Trade Act staff will assist in Rapid Response events to inform affected workers of potential Trade Act benefits and answer questions. Once the petition is certified, Rapid Response and Trade Act staff continue to coordinate service delivery to the workers, e.g. information sessions, application completion, planning sessions, coordination with the local one-stops and other service providers, and so forth. The sessions can take place both on-site at the employer location and at other facilities that are convenient for the affected workers. Since this model was only recently implemented, staff are gathering data to validate whether this service delivery model is resulting in increased access and use of TAA benefits by those individuals deemed eligible.

- ***Provides core and intensive services to TAA participants, especially where TAA-funded case management services are not available. The description should provide detailed information on how assessments are utilized to identify participants' services needs, including whether participants need training according to the six criteria for TAA-approved training. (20 CFR 617.21(c), 617.22(a)).***

We utilize a centralized case management model that expands services delivery beyond the local one-stop center structure. With the geographic constraint addressed, we were free to organize staff and work tasks to bring the greatest level of efficiency. We implemented an enhanced toll-free hotline and fax capacity, and we are exploring other technology solutions, such as Skype, that can be used from a one-stop or from an affected worker's home. This model has helped us achieve our goal—to provide high levels of customer service and program consistency, yet with enough flexibility to meet the needs of our clients regardless of where they are located. OED, as part of its agency strategic plan, will be further evaluating key processes for opportunities to streamline and improve customer experiences, shorten turn-around times, and add value.

The centralized model has benefits in that Oregon has a significant rural population, with a majority of affected workers being many miles from a local one-stop. This situation can be found in our metropolitan areas as well, where the distance may not be significant, but travel to a local center takes considerable time. Of the affected workers attached to the 27 Trade Act certifications in Oregon between January 1 and December 31, 2011, 51.9% were on “Non-Metro” areas as determined by the Bureau of Labor Statistics.

In the past, we had trained Trade Act case managers in several locations across the state. This often meant that case managers worked alone—without local backup support, or staff travelled to other locations where the assistance was needed. In contrast, Oregon’s centralized case management model builds upon Oregon’s local and virtual one-stop services. For example, during a Rapid Response event, affected workers are provided information on engaging the one-stop system early. Workers are encouraged to register and complete their initial skills review online or at a local center as soon as possible, which then leads to an interview with center staff to review of their skills and registration, and a determination of next steps.

Normally, the sequence of services for an affected worker follows this process: The worker participates in Rapid Response services where they learn about WIA, W-P, and Trade Act services. Rapid Response staff covers the broader one-stop system and services, encouraging the workers to begin participating early. Once the company is certified under Trade Act, information sessions are conducted, and workers are provided with applications, scheduled for their initial assessment, and given other paperwork that can help with the decision around suitable work or training. Partner staff (WIA, W-P, and others) often attend the Trade Act information sessions, reinforcing earlier conversations around the broader range of services. All of this is done to prepare the affected worker to work with their case managers. At this point, affected workers are participating in activities on both the core services and Trade Act tracks.

By the time of the Trade Act initial assessment appointment, the affected worker has completed enrollment in the one-stop system. This information is used by the Trade Act case manager to help guide the initial assessment, which determines next steps for the affected worker. If the assessment concludes that suitable work is available, or that the worker does not want training, an individual service plan (ISP) is developed and the case manager will continue to support the worker. This includes working with TRA staff on a waiver, and coordination with the local center regarding job search, workshops, and accessing intensive or wrap-around services not available through Trade Act (possibly available through WIA, an NEG, or other partners). Case managers will follow-up with the client every 45 days for support and ongoing evaluation of current activities and results noted ISP.

If the initial assessment points to training, this is reflected in the ISP, and further steps are taken by the case manager and affected worker to determine suitability. The case manager shares information on available training and financial aid, and how to evaluate programs using employment statistics. At this point, the affected worker may interact with a local training provider to complete placement tests and other academic assessments that will help the school and affected worker align interests and abilities. This, in turn, will inform any discussions around

short-term prevocational services and remedial education, which further influences the evolving ISP.

Once the affected worker has identified potential training options, the case manager and affected worker go over the six criteria for TAA-approved training. The first criteria, “is suitable employment available,” is addressed during the initial assessment and at each subsequent step during training plan development. The affected worker is pursuing training because no suitable work was available, so it is a matter of evaluating the proposed training and completed assessments against the remaining criteria.

Criteria two, “would the worker benefit appropriate training,” is evaluated using pieces from the initial assessment that explore the worker’s financial, health, educational, work and other critical areas that affect how a person can relate to and manage through an academic program, along with the results from their Trade Act guided, career exploration workshops.

Criterion three, “reasonable expectation of employment after training,” is evaluated using labor market statistics, current job openings, and placement activities of the training providers.

Criteria four, “is training reasonably available to the worker,” looks at where the training is located—first, within the commuting area. However, that is not always the case, so we look at what is involved in getting to the location, and makes comparison with other training that may be suitable for the worker.

Criterion five, “is the worker qualified to undertake and complete such training,” is evaluated using assessment results from the training providers, along with information used in validating the second criteria.

Finally, criteria six, “is such training suitable for the worker and available at a reasonable cost?” With suitability previously addressed, the case manager looks at the cost of the proposed training programs. Total costs (training, travel, tools, length of training on impact of UI / TRA benefits, etc.) are compared with the total cost of similar training from other training providers to identify the one with the lowest overall cost to the program. Consideration is also given to what it costs to train other affected workers from similar occupations and with similar backgrounds—the objective is to fairly evaluate a worker’s current skills and abilities and what it takes to make them job ready versus subsidizing an expensive training program that may or may not lead to equal employability and salary levels.

Once the six criteria are satisfied, and the final training selected, a training plan is developed with appropriate benchmarks. This again updates the ISP. The affected worker begins training accordingly, and benchmarks are monitored to ensure successful completion. The case management process is ongoing and issues are addressed at the earliest opportunity. Upon completion of training, the ISP is updated, and the affected worker then moves into the job search phase of case management.

- *Has developed and managed resources (including electronic case management systems) to integrate data provided through different agencies administering benefits and services (TAA, Trade Readjustment Allowance, Unemployment Insurance, Employment Security, WIA, etc.) in order to ensure consistent program administration and fiscal integrity, as well as reliable fiscal and performance reporting. (May alternatively be discussing in “operating systems and policies” section of Operation Plan). (WIA Sections 112(b)(8)(A), (B).*

The Employment Department (OED) operates the Trade Act program, along with Trade Readjustment Allowance (TRA), Unemployment Insurance (UI) and Employment Service (ES) programs and the various fiscal systems that support each. OED also maintains transactional data systems that support real-time data sharing across all programs under the agency, along with a data warehouse which supports program reporting and ad-hoc query capability. Agency staff that handle different elements under Trade Act (TAA, TRA, UI, and ES) utilize common systems which share and coordinate data to ensure the accurate delivery of services. Some examples include:

- Waivers cannot be generated without documented completion of the initial assessment.
- Affected workers cannot transition from the regular UI process until there is an approved training plan in the system.
- TRA benefits are not made available until appropriate decisions regarding regular UI benefits have been made and captured in the UI data system.
- Purchase orders and checks cannot be generated until data from an approved training plan is uploaded.

Overall, OED staff and data systems are linked, and the data are fed into the data warehouse, which supports federal reporting.

Data from the various WIA systems is transmitted to OED and uploaded into the data warehouse where it is used for reporting purposes. At this time, data between WIA and OED systems are not shared at the transactional level; however, we are in the process of developing a customer status screen that provides a high-level overview to the various transactional systems. Currently, one-stop staff are doing an effective job of coordinating services across the programs, so the goal of the customer status screen is to make the information sharing easier, requiring less time and effort on the part of staff.